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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

J.B.,

Plaintiff,

vs.

LEVI GRAY et al.,

Defendants.

NO. 3:23-cv-01962-CL

UNOPPOSED MOTION TO EXTEND  
CASE MANAGEMENT DEADLINES

Pursuant to LR 7-1(a), counsel for plaintiff certifies that she has conferred with defense counsel and Mr. Gray, and they do not oppose this motion.

Pursuant to FRCP 6(b), the plaintiff moves the court to extend the case management deadlines by approximately six months as follows:

Close of Fact Discovery	June 6, 2025
Expert Disclosures	July 3, 2025
Rebuttal Reports	August 1, 2025
Close of Expert Discovery	September 5, 2025
Dispositive Motions/Joint ADR Report	October 3, 2025

This unopposed motion is requested because the parties have not completed discovery.

This unopposed motion is supported by the declaration of Lynn S. Walsh attached hereto.

DATED: November 4, 2024

/s/ Lynn S. Walsh  
Lynn S. Walsh, OSB #924955  
Attorney for Plaintiff

## CERTIFICATE OF SERVICE

I certify that I mailed via first class mail and email the following Unopposed Motion to Extend Case Management Deadlines on November 4, 2024 to the following individuals:

Levi Gray  
2232 SE Pine St. #7  
Portland, OR 97214  
levvus007@gmail.com

/s/ Lynn S. Walsh  
Lynn S. Walsh, OSB #924955  
Attorney for plaintiff